

EXHIBIT A

Court Subpoena

United States District Court
SOUTHERN DISTRICT OF NEW YORK

TO: Michael Avenatti
c/o Robert M. Baum, Esq.
Federal Defenders of New York, Inc.
52 Duane Street, 10th Floor
New York, New York 10007

GREETINGS:

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the United States District Court for the Southern District of New York, 40 Foley Square, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: January 24, 2022

Appearance Time: 9:00 a.m.

Appearance Place: Courtroom TBD

to testify and give evidence in the following matter:

United States v. Michael Avenatti, 19 Cr. 374 (JMF)

and not to depart the Court without leave thereof, or of the United States Attorney.

If, as, and when you determine that you will testify in your own defense, produce the documents and information in your possession, custody or control, or the possession, custody or control of your agent(s), listed on the attached rider. In order to minimize the risk of creating a need for a recess or continuance, please comply with the subpoena at least one day prior to your taking the stand.

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York
December 14, 2021

Damian Williams
DAMIAN WILLIAMS
*United States Attorney for the
Southern District of New York*

Robert B. Sobelman
Robert B. Sobelman
Assistant United States Attorney
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New York, New York 10007
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RIDER

(Trial Subpoena to Michael Avenatti, dated December 14, 2021)
Ref. No. 19 Cr. 374 (JMF)

Definitions and Instructions:

1. This Subpoena calls for the production of specific documents – including those maintained in digital or hard copy format – in your possession, custody, or control.
2. With the exception of documents containing handwritten notes, please produce requested records in electronic form (native format where necessary to view the material in its full scope) in a manner that is OCR-searchable, and with all available electronic metadata. Please provide the originals of all papers, notepads, notebooks, diaries, or calendars upon which responsive handwritten notes may be found.
3. The term “documents” includes writings, emails, text messages, WhatsApp messages, drawings, graphs, charts, calendar entries, photographs, audio or visual recordings, images, and other data or data compilations, and includes materials in both paper and electronic form.

Materials to be Produced:

For the time period of February 1, 2018 through March 25, 2019, produce the following documents:

1. Any and all financial records that reflect your income or compensation of any kind, including in-kind, or the income of any law firm in which you were a partner or by which you were employed, including state and federal tax returns, W-2 and 1099 tax forms, pay stubs and checks, and bank records showing the deposit or transfer of such funds (except for communications between you and any individual who was your client at the time of the communication).
2. Any and all documents, including communications, relating to or reflecting debts of any kind owed by you or by any law firm in which you were a partner or by which you were employed (except for communications between you and any individual who was your client at the time of the communication).
3. Any and all documents, including communications, relating to or reflecting your efforts to obtain loans or financial credit of any type from any source for yourself or any law firm in which you were a partner or by which you were employed.
4. Any and all documents, including communications and retainer or fee agreements, relating to or with Stephanie Clifford, also known as “Stormy Daniels”; Denver Nicks; any officer, employee, or agent of Janklow & Nesbit Associates; and any officer, employee, or agent of St. Martin’s Press or its parent company, MacMillan Publishers.
5. Any and all documents, including communications, relating to the preparation and transmission by email on or about August 1, 2018, of a letter that purported to be from Stephanie Clifford, also known as “Stormy Daniels,” to Janklow & Nesbit Associates, regarding wiring instructions for book advance payments.

6. Any and all documents, including communications, relating to the receipt of funds on or about August 1, August 3, and September 17, 2018, and the subsequent disposition thereof, from Janklow & Nesbit Associates to accounts controlled by you or any law firm in which you were a partner or by which you were employed.
7. Any and all documents, including any written disclosure, accounting, notification, or other record relating to any trust or client accounts for Stephanie Clifford, also known as "Stormy Daniels."